

UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TENNESSEE  
JACKSON DIVISION

In Re: Case No. 18-12246  
VIRGINIA I. SPENCER, Chapter 7  
DEBTOR.

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AMENDED OBJECTION TO TRUSTEE'S MOTION TO SELL PROPERTY FREE AND  
CLEAR OF LIENS UNDER SECTION 363(f) REGARDING REAL PROPERTY LOCATED  
AT 627 KELLER STREET, BOLIVAR, TENNESSEE 38008

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COMES NOW, Select Portfolio Servicing, Inc., as Transferee of Nationstar Mortgage LLC d/b/a Mr. Cooper, ("Select Portfolio Servicing, Inc.") by and through the undersigned Counsel, and hereby files this Amended Objection to the Trustee's Motion to Sell Property Free and Clear of Liens Under Section 363(f). Select Portfolio Servicing, Inc. would state that per the terms of the Agreed Order at Docket Entry No. [38], provision numbered two (2):

"Should the Trustee fail to sell the Property within the one hundred and twenty (120) days provided, Nationstar Mortgage LLC d/b/a Mr. Cooper, its successors or assigns, shall have relief from the automatic stay and abandonment of the Property from the Trustee without further order from the Court, and will be entitled to pursue all of its rights and remedies relating to the Property pursuant to state law as applicable."

Select Portfolio Servicing, Inc. would state more than one hundred twenty (120) days have passed since the entry of the Order at Docket Entry No. [38].

In the event the Trustee is allowed to proceed with the sale, the Court should condition the sale upon Select Portfolio Servicing, Inc. being paid in full based upon an updated payoff statement at the time of closing.

WHEREFORE, Select Portfolio Servicing, Inc. requests an opportunity to be heard on the matter.

/s/ Bonnie Culp

Bonnie Culp, Attorney for Creditor, Bar # 14741

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### **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the foregoing response has been electronically served or mailed, postage prepaid on October 28th, 2019 to the following:

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Virginia I. Spencer  
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Bolivar, TN 38008

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/s/ Bonnie Culp

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